

OCT 27 2005

BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)

Highmark, Inc.)

George Grode)

MUR 5645 OCT 27 12 48 19

GENERAL COUNSEL'S REPORT #4

SENSITIVE

I. ACTIONS RECOMMENDED

Accept the attached conciliation agreement and close the file as to Highmark, Inc.

("Highmark") and take no further action and close the file as to George Grode.

II. DISCUSSION

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A. George Grode

B. Federal Contractor Provision

C. Civil Penalty

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D.

E. Analysis

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Accordingly, this Office recommends that the Commission accept the attached agreement and close the file as to Highmark.⁶ In addition, we recommend that the Commission take no further action and close the file as to George Grode.

F. The File in MUR 5645

This Report recommends that the Commission close the file as to Highmark and George Grode.

III. RECOMMENDATIONS

1. Accept the attached conciliation agreement and close the file as to Highmark, Inc.

⁶ A check has not yet been received for the proposed civil penalty.

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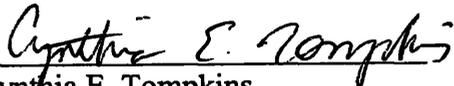
2. Take no further action and close the file as to George Grode.

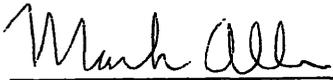
3. Approve the appropriate letter.

Lawrence H. Norton
General Counsel

Date: 10/26/05

BY: 
Rhonda J. Vosdinger
Associate General Counsel
for Enforcement


Cynthia E. Tompkins
Assistant General Counsel


Mark Allen
Attorney

Attachments:

- 1. Signed Conciliation Agreement

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